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U.S. DISTRICT COURT
DISTRICT OF MASS.
Director: (781) 997-1567

October 20, 2006

United States District Court
for the District of Massachusetts
1 Courthouse Way, Suite 2300
Boston, MA 02210
Attn: Ms. Zita Lovett

RE: Susan Cooney v. Saybrook Graduate School and Research Center
United States District Court; Docket No. 04 11572 JLT

Dear Madam Clerk:

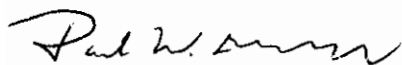
I am writing to follow up our telephone discussion of yesterday afternoon. The above case is scheduled for trial on November 13, 2006. We have not received notice of a final pre-trial conference, nor any trial scheduling order.

We also discussed there is a pending motion for summary judgment, which defendant filed on August 21, 2006. This past Monday, Attorney Bacon requested leave to file a Reply Brief to Defendant's Opposition. Plaintiff will not file any response to the purported Reply Brief. The parties are awaiting a decision or hearing notice.

Plaintiff would appreciate the court's prompt confirmation of the current trial date. As the court is aware, arrangements must be made for the attendance of expert and fact witnesses, including several from California. In both July and August, plaintiff's counsel sought confirmation that Maureen O'Hara and Saybrook's other California witnesses would be available for trial. There has been no reply from defense counsel. There are also voluminous proposed exhibits that must be exchanged and reviewed.

We would appreciate confirmation of the trial date at the court's earliest possible convenience, as well as guidance on the other issues noted. Thank you.

Very truly yours,



Paul W. Morenberg

cc: Michael Alyward, Esq.
Michael Vartain, Esq.

Grace V. Bacon, Esq.
Ms. Susan Cooney

E. Steven Coren, Esq.